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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL
PERSONAL IDENTIFYING INFORMATION
CONTAINED IN DEFENDANTS' REPLY
SUPPORTING MOTION FOR ENTRY OF
AN ORDER TO SHOW CAUSE AND
LIMITED DEPOSITIONS**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, declare as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I offer this
4 Declaration in the above-captioned matter in support of Uber’s Administrative Motion to Seal Personal
5 Identifying Information Contained in their Reply Supporting Motion for Entry of an Order to Show Cause
6 and Limited Depositions and Related Documents (the “Sealing Motion”).

7 2. Counsel for Uber previously met and conferred with the Nachawati and Chaffin Luhana
8 firms concerning the sealing of personally identifying information (“PII”) in connection with Uber’s
9 Motion for Entry of (1) an Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
10 Receipts Should Not Be Dismissed with Prejudice and (2) a Case Management Order Addressing Certain
11 Plaintiffs Who Have Not Submitted Receipts. ECF 3602-1. Counsel indicated that they did not oppose
12 sealing PII, including counsel from Chaffin Luhana who serves as part of Plaintiffs’ Leadership in this
13 matter. The Court granted Uber’s motion to seal. ECF 3616. The sealed information contained in the
14 instant Sealing Motion is similar to the PII that has already been filed under seal and unopposed.

15 3. Counsel for Uber also previously made diligent efforts to meet and confer with Plaintiffs’
16 counsel concerning the sealing of PII in connection with Uber’s Motion for Entry of an Order to Show
17 Cause Why 6 Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed with
18 Prejudice. Those efforts are detailed in my declaration in support of Uber’s motion to seal the PII in that
19 motion. ECF 3783-1. Counsel for Uber have not received any communications from any Plaintiff’s
20 counsel regarding opposition to the sealing of the material detailed in ECF 3783. The sealed information
21 in this Sealing Motion is similar to the PII that was included in Uber’s prior motion to seal.

22 4. On the basis provided above, the Court granted Uber’s Administrative Motion to Seal
23 Personal Identifying Information Contained in Defendants’ Motion for Entry of Third Receipts Order and
24 Accompanying Documents. ECF 4142. Some of the sealed information contained in the instant Sealing
25 Motion is a subset of information sealed by the Court’s sealing order on Uber’s opening Motion for Entry
26 of Third Receipts Order, and other sealed information contained in this Sealing Motion is similar to the
27 PII that has already been filed under seal.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true and
2 correct.

3 Dated: November 3, 2025

Respectfully submitted,

4 /s/ Christopher V. Cotton

5 CHRISTOPHER V. COTTON

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